# Response of the Green Councillorsto Bedford Borough’s Local Plan 2040 Draft Plan ‘Strategy Options and Draft Policies Consultation’

Our vision would be for a Borough that aims fundamentally for increasing wellbeing, and particularly for the most disadvantaged: by contrast, the draft aims fundamentally for increasing the rate of economic activity, whether or not that activity is consistent with the other elements of wellbeing, and whether or not that activity worsens inequality.
We welcome the early mention in the document and apparent high priority given to “Tackling climate change and adapting to and mitigating its effects”. However, if the council “has pledged to incorporate the carbon neutral ambition into all Council strategies, including the Local Plan 2040”, this Plan *should* include policies consistently written in ways that pay more heed to the climate emergency than those revealed in this document. Detail is needed on how to meet the ambition of “Bedford [being] a net zero carbon emissions borough whilst improving, enhancing and creating green infrastructure and spaces”. Such detail is very notably absent. Unless there are major amendments this document will be a massive missed opportunity. All told, **our assessment is that this document does nothing like enough to meet that aim of tackling climate breakdown, adaptation and mitigation**, nor is it consistent with the non-economic elements of wellbeing, or promoting equality.

# “Vision and Objectives”

Among the “Vision and Objectives” actually listed, wherever infrastructure projects actually are roadbuilding, we reject that as an appropriate means to attract “new business through the completion of significant infrastructure projects”. Attracting business by roadbuilding is fundamentally contrary to the requirements of getting to net zero, and using “infrastructure” to disguise the promotion of roadbuilding is deception of a sort that the council should not be indulging in. Put simply, roadbuilding works against the more fundamental aim of “Tackling climate change and adapting to and mitigating its effects”. Further, there is a tendency for businesses attracted by roadbuilding to be in locations that are difficult for potential employees to access except by cars, restricting employment to those with access to cars (when some cannot afford cars, increasing numbers live in properties without car parking, and others have impairments such as visual impairments and epilepsy that preclude driving). Thus, attracting businesses by roadbuilding can worsen inequality.

The overall lack of ambition is, in part, seen by talk in the “vision and objectives” of High Street businesses only being retailers. A visionary approach to the High Street would include attracting repair businesses, as well as combined production/retail spaces such as artists’ studios and artisan bakeries. Moreover, the better part of the objective, making it “a more enjoyable place, where … people choose to linger” will require policies to encourage non-retail development, including (daytime) performance spaces and opportunities for free recreation, yet these policies are absent.

Talk of “Additional town centre living” would be welcome, but this needs to be town centre living with sustainable transport, which implies better cycling provision than current Plan 2030 policies, yet there is no proposal for relevant better policies, and as already mentioned, businesses attracted to locations that are difficult for potential employees to access except by cars will exclude those living in the town centre, at a time when town centre employment is reducing. Again, the words of the “Vision and Objectives” sound good but are not reflected in detailed policies that will actually meet the good ambitions.

Unusually with respect to walkable neighbourhoods, we don’t even get what might notionally be called significant ambition in the “Vision and Objectives” – “More” is an incredibly weak word. A visionary objective would be that the norm will be walkable neighbourhoods. It is only when neighbourhoods being walkable becomes the norm that significant reductions in car use for such local journeys becomes realistic.

We are disappointed that talk of the River Great Ouse valley is related to parkland. We need, as a council, to put more emphasis on protecting and increasing biodiversity in the valley (as well as more broadly in the Borough).

## **Themes**

As we get further into the document, we see more problems. Theme 1 claims to be “Greener”, but by 2040, the aim should not be merely “working towards” net zero. We should have already got there. Worse, within the theme, there is no objective about reducing energy use. Without such an objective, the talk of “working towards net zero” is empty words. The “Strategy Options and Draft Policies Consultation” falls wildly short of any claims to be “Greener”.

The relatively hollow words about “Greener” are even undermined by “Theme 2: More accessible”. The first objective within this theme 2, to “Reduce congestion in the borough” undermines being Greener. Reducing congestion should NOT be an objective. Reducing congestion tends to work against sustainable travel. The objective, rather, should be to promote a modal shift away from the use of motor vehicles, and if (but only if) that is sufficiently successful in reducing the amount of land needed for current congestion levels, the amount of land taken up by roads should be reduced. Similarly the aim to “Improve ‘first mile / last mile’ local connections to strategic infrastructure, allowing for easier access and greater integration” could easily be used to ‘justify’ actions that undermine the claims to be “Greener” – if this ‘first mile / last mile’ refers to transport, the priority should be easier access to and greater integration with public transport, cycling and walking networks, NOT the strategic road network, yet the proposed objective does not acknowledge that some sorts of ‘first mile / last mile’ connectivity are better than others, and some are more consistent with theme 4 than others. While mention of making walking and cycling more attractive is welcome, this objective fails to recognise that they shouldn’t just be made more attractive, they should also be made safer, at all times of day and night. The detailed policies needed to bring about safe networks of walking and cycling routes are notably absent from the document, including most glaringly the continued failure to provide adequate safe and segregated access for those cycling to/from the station.

“Theme 3: More prosperous” as written further undermines claims to be “Greener”.

The aim to “Support a stronger local economy delivering economic growth” has a fundamentally anti-green aim. Economic “growth” means ever-faster turnover of production and destruction, resource extraction and waste disposal. The council should, rather, be aiming for increasing wellbeing for the local population, which sometimes, but not always, is related to economic activity and thus growth. Where economic activity does not promote wellbeing (for example by causing pollution and environmental damage), it is wellbeing that should be pursued, rather than growth. Objectives that would be better for the wellbeing of the people of Bedford (and the rest of the world) would not focus so tightly on economic growth. Attracting and enabling high value businesses to prosper would be an appropriate objective if, and only if, those businesses actually work “for the benefit of the borough’s existing and future residents”. The assumption in the current objective that they will always do so is false, as witnessed by communities elsewhere that have been damaged by “high value” businesses (when that value is considered purely in financial terms).
Similarly, while it is a good objective to “Create a distinctive, attractive and multi-functional town centre for the future, with a focus on leisure, culture and visitor … activities, and high-quality urban living”, these should be promoted for themselves, with visitor activities not being the narrower “visitor economy activities” of the current objective.
The objective to deliver social infrastructure should not be limited to what is “necessary … to support growth”. Social infrastructure that promotes wellbeing should be an objective for its own sake.

It is good to see the value of improving “the borough’s transport infrastructure in order to … to make the borough more attractive as a place to live” is recognised, but making the borough a more attractive place to live and improving welfare should be the aims, rather than “to support growth in the local economy”, regardless of whether that growth improves welfare. Further, improvements in transport infrastructure to promote welfare should be concentrated on public transport, walking, and cycling infrastructure, in part to meet the requirements of Theme 4. Historically, compared to transport infrastructure for cars and lorries, public transport, walking and cycling have suffered massive under-investment, and much more can be done to promote wellbeing in the borough by concentrating on public transport, walking, and cycling.

Theme 4: Better Places is much more acceptable as written than Themes 1, 2 and 3. We note that practically achieving “a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities” *necessarily* will require much better attention to public transport, walking and cycling. Not everybody can use private cars (for reasons including affordability and impairments). Thus, for **everybody** to have appropriate access, the utter reliance on private cars in many parts of the Borough *must* be ended.

# Growth and spatial strategy options

We reject the Government’s assessment of “housing need”. In a country with more bedrooms per head of population than ever before, the issue is one of distribution of housing, not overall supply. Large scale inward movement of population into Bedford Borough from other parts of the country will increase demand for housing, work against needed improvements in affordability here and increase inequality within the country.
The picture is further complicated by the Government’s spatial framework for the OxCam Arc expected in January 2023. There is a severe danger that that special framework will undermine this proposed Local Plan. In addition, the Council is a member of the Central Area Growth Board. If the Central Area Growth Board is trying to “provide the strategic leadership that will enable planning for economic transformation across the central area of the Oxford to Cambridge Arc.”, it would be expected that this Draft Plan would relate its proposals to the ideas of the unmentioned Central Area Growth Board. Again, the possibility that the plan will be undermined by such a Board is very worrying.
However, we recognise that, unless it successfully challenges them, the council is compelled to work within central Government targets, and thus all that can be done locally is to make the best of the resultant requirement to provide opportunities for housebuilders to make unwarranted profits.

As part of this, we support Neighbourhood Plans. Unreasonable central Government pressure should not result in large numbers of houses being added to village-after-village in the face of local opposition.

We explicitly reject talk of the “A421 transport corridor”. Such road-based development is fundamentally inconsistent with Theme 4 of the policy and the objectives it outlines, or what would truly be required by Theme 1, let alone the apparent high priority given to “Tackling climate change and adapting to and mitigating its effects”. The resource used by private road transport (whatever energy source is used) is greater than that which is consistent with “a borough where everybody has appropriate access”, let alone tackling climate breakdown and its impacts.

On this basis, our assessment is that Option 2c appears to be the least-worst of the options, with more scope for rail-based transport, however, of the elements of this option, development at Wyboston looks the least likely to be associated with good public transport, particularly if the A428 is redirected to be south and east of Little Barford.

There may, further, be concerns about flood risk in low-lying land, especially as climate breakdown brings about extra severe weather events.

Paragraph 3.23 outlines “principles [that] provide a framework for Bedford’s existing transport policies”, yet they fail to mention public transport. While principles 1, 2 and 4 all actually imply public transport, the failure to mention public transport is a glaring omission.

Principle 1 risks being self-defeating. Working towards reduced congestion is likely to work *against* delivery of low carbon transport. Congestion provides vehicle owners an incentive to use other methods of transport, or to keep journey lengths down. To deliver low carbon transport requires provision for public transport, and low energy consumption forms of transport, such as cycling, walking and rail.

Principle 2, “Promote connectivity and accessibility” can only truly be met by providing connectivity that is accessible to all, including those with financial constraints and impairments that preclude them using private cars.

Thus, to truly meet “Principle 4 – Promote and support infrastructure development”, the infrastructure that needs to be developed is public transport, walking and cycling infrastructure, in communities that are designed whereby the norm is walkable neighbourhoods.

The claim under 3.24 that “The current polices … do not need to change” does not withstand scrutiny. They are not compatible with the vision of “Tackling climate change… at the heart of new development throughout the borough”, they are not compatible with Theme 4: Better Places, and its objectives, and they are not compatible with Theme 1 if there is an honest desire to make the borough “Greener”.

# Employment

We cannot support the idea that “most B1 development is likely to be within lower density business park sites”. Such developments are not compatible with sustainable transport modes – they are very rarely on bus routes, are not within walking distance of significant numbers of homes, and are rarely well integrated with cycle networks. As such, lower density business park sites are often only suitable for providing employment to the relatively privileged who can afford to run a car, and who do not have impairments that prevent them from driving.

Thus, lower density business park sites should only be built where workers can get to/from work using sustainable transport modes, and with car parking provision restricted to a level that is appropriate for sites where the majority of workers use sustainable transport modes. Since such sites would need less car-parking, their density would *not* be so low, and thus less land would be needed for such developments.

In 6.7 the consultation says “sites that are well connected to transport networks and the strategic road network in particular”. The road network must NOT be allowed to be taken as a proxy for “transport networks” in general. The council’s commitment to tackling climate breakdown cannot be met with the energy consumption associated with ever-larger scale use of cars to travel to work, regardless of the energy source used to power those cars.

The comment in 6.8 that “new allocations for large-scale warehousing are not appropriate” is very welcome. Not only is large-scale warehousing low-skilled, but it tends to be part of a shift to reduced employment in warehousing, with smaller warehouses being replaced with larger ones with less employees per square metre, and with greater use of road transport as vehicles travel further between a smaller number of larger warehouses.

Proposed policy E1S should be amended, since Policy 72S (of Bedford Local Plan 2030) in turn should be amended. Sites should not be considered appropriate if the range of transport modes does not include **both** public transport at relevant hours for employees **and** practical access at relevant hours for those using active transport to/from substantial concentrations of housing.

# Development management policies

In terms of quality of development, **the single most important change that should be made would be to include embodied carbon as a material planning consideration.** This is the most direct relationship between planning and climate impacts that could be influenced by planning policy. Only by including embodied carbon as a material planning consideration is there a remote hope that “the carbon neutral ambition” will be meaningfully incorporated into the Local Plan 2040.

Parking Standards for Sustainable Communities SPD 2014 needs supplementing at minimum for the rapidly increasing number of residential developments in the town centre where there are homes with no right to park a car. In such cases there is a need for greater provision of cycle parking, and also provision for car-club parking.
More generally, a standard of one cycle space per bedroom is not sufficient for use by households who may wish to cycle together. The minimum provision should be one cycle space per bedspace (ie two per double-bed or twin bedroom), plus sufficient storage for trailers and/or non-standard cycles. Where there are homes with no right to park a car, it is also reasonable to expect a proportion of residents will have more than one cycle (for example a cheap cycle for trips to the shop, in addition to a good cycle for longer journeys where there is secure parking at both ends of the journey).

We oppose the detail of the plan to replace Local Plan 2030 Policy 43. Since “Environmental net gain = biodiversity net gain + natural capital gain”, environmental net gain is not necessarily greater than biodiversity net gain. It would be compatible with biodiversity net **loss** if there was “compensating” natural capital gain. The policy *should* be that there is never any biodiversity net loss nor natural capital net loss in any case, while overall there is Environmental net gain in every case.

# Detailed Policies – Required amendments to current policies

Current Policy 8 - Key development sites in St Paul’s Square, Bedford. While it is not mentioned for change, it would be appropriate for this policy to be changed to include explicit provision for the continued use of the riverside path and the route across the Bank Building site as a safe cycle path, but without the current barriers associated with wheelchair access to the Shire Hall building.

Current Policy 10 – The station area, Ashburnham Road, Bedford. While it is not mentioned for change, it would be appropriate for this policy to be changed to include explicit recognition of the value in retaining nos 2, 4, 8-12 and 20, with their greater architectural and historic value than neighbouring buildings. Amendment to include explicit recognition of the need for safe cycle routes to/from the station (including after dark) would be highly desirable. Similarly Policy 11 – Greyfriars, Bedford should be amended to include explicit mention of cycle access to the bus and rail stations, even though it is not mentioned for change in the draft.

Current Policy 13 – Land at Borough Hall, Bedford, again not mentioned for change, would be appropriately considered for change. Since that policy was made, there has been a considerable shift from office-based working towards home working, meaning that the key principles of development in that policy should be revised, without the “Retention of the riverside and main Borough Hall buildings for office and other uses”. “Provision of car parking at Prebend Street” should cease to be a ‘key principle of development’. While continued provision of some car-parking is appropriate, the climate emergency requires a modal shift away from car use, which needs to be accompanied by a reduction in car parking. There is scope, space and a need for there to be a cycleable off-street route between Prebend Street and St Mary’s Gardens that should be provided for.

Current Policy 14 – Land south of the river, Bedford should be amended to permit the closure of Kingsway and the return of the Kings Brook as part of the new neighbourhood, rather than explicitly requiring it to be an “urban boulevard” lined with “larger scale buildings and more continuous frontages”. There should also be explicit protection for green space on the former St Johns station site. Again, this policy is not mentioned for change in the draft.

Current Policy 16 – Bedford High Street should be retained in full. Proposed TC3 – Bedford town centre – changes of use - does *not* include the same provisions. In particular, the aim to reduce vehicular traffic in the High Street should be retained. While the situation has improved in recent years, changes such as the removal of the pelican crossing at Lurke St/Lime Street make further reductions in traffic important. Further, reductions in use by motor vehicles could enable provision of cycle paths both northbound and southbound to contribute to the needed modal shift and increase in active travel and active lifestyles. The requirement for shop fronts and signage to have “full regard to the architecture and heritage of the buildings” and the requirement for refurbishment of buildings to “contribute positively to the character and heritage” of the town should be retained, when they are proposed to be deleted.

Current Policy 29 – Design quality and principles is not proposed for amendment, but should be amended to include embodied carbon as a material planning consideration, and a requirement for tree-coverage (perhaps at half the level required within the Forest of Marston Vale, current policy 36S – ie at 15%). Accessibility and permeability should explicitly include provision for safe and pleasant cycling and walking as part of integrated networks enabling the walkable neighbourhoods and active travel that the draft plan claims to promote.

Current Policy 32 – The impact of development, disturbance and pollution impacts – is not proposed for amendment, but should be amended to include explicit mention of pollution caused by road traffic. Pollution should be explicitly defined to include global as well as local impacts.

Current Policy 34 – Advertisements – is not proposed for amendment, but should be amended, so that considerations that can be considered also include energy use.

Current Policy 39 – Retention of trees – is not proposed for amendment, but should be amended, so that in all cases when trees are lost, proposals should be included for them to be replace by an equivalent *volume* of trees that will include at least an equivalent diversity of species, and with at least one tree in a location no less urban than the current location of any tree lost.

While replacing current policy 43 is appropriate, proposed policy NE1 Environmental net gain should be clearer that neither net biodiversity nor natural capital net loss is acceptable.

Current Policy 44 – River Great Ouse – is not proposed for amendment, but should be amended, so that there is a requirement for development proposals to improve and protect *marine* environmental gain within the borough, such that marine biodiversity and marine natural capital losses may not be offset by on-land biodiversity and natural capital gains.

Current Policy 46S – Use of previously developed land and use of undeveloped land – is not proposed for amendment, but should be amended to recognise that agricultural land of the same grade may be have different levels of biodiversity, so that land that has been at a lower level of biodiversity for 30 or more years should be used in preference to the same grade of agricultural land that has a higher level of biodiversity (or has done within the last 30 years – this proviso being to remove any incentive to degrade land).

Current Policy 47S – Pollution, disturbance and contaminated land – is not proposed for amendment, but should be amended to include explicit mention of pollution caused by road traffic. Pollution should be explicitly defined to include global as well as local impacts.

Current Policy 51S – Climate change strategic approach – is not proposed for amendment, but should be amended to include energy use and to explicitly include emissions under all of scopes 1-3. The word “reducing” should be replaced by the word “minimising”.

Current Policy 53 – Development layout and accessibility – is not proposed for amendment, but should be amended. Developments that cannot demonstrate “convenient access to local services by foot, cycle and public transport” should not be acceptable, except where mitigation is made for such deficiencies, with developers required to implement or contribute towards measures to mitigate adverse impacts before their development is occupied, and such mitigation shall be provided in ways that mean the net equality impact of the development and mitigation improves accessibility most for those who are more disadvantaged. While natural ventilation is beneficial, it should not be at the expense of high levels of insulation: ventilation with heat exchange should be the preferred option.

Current Policy 54 – Energy efficiency – is not proposed for amendment, but should be amended. It is too easy for developers to claim that requirements “would make the development unviable”, and the policy needs to be amended both to remove (or dramatically reduce) this loophole, and to strengthen requirements, given that both technologies to improve energy efficiency have improved, and the need for energy efficiency has increased with continued climate breakdown. Among the strengthening of requirements should be some requirements on somewhat smaller non-residential developments.

Current Policy 57 – Renewable energy, general impact – is not proposed for amendment, but should be amended given the severity of the climate emergency. Current requirements for wind energy schemes are excessive, and the standards should generally be relaxed for community energy projects (other than biomass/’energy from waste’). The requirements for consultation and engagement with affected local communities should be lifted for wind energy schemes and solar energy schemes that are not on agricultural land.
By contrast, for biomass/’energy from waste’, impacts that should be considered should include traffic impacts and other potential ways of dealing with the fuel material, including options further up the waste hierarchy. In doing so, climate damaging emissions should be considered at all of scopes 1, 2 and 3.

Current Policy 58S – Affordable housing – is not proposed for amendment, but should be amended. Failure to amend it will allow the continued worsening of problems of housing affordability and inequality. As with Current Policy 54, it is too easy for developers to claim that requirements “would make the development unviable”, and the policy needs to be amended both to remove (or dramatically reduce) this loophole. The lower threshold for size of site should be reduced, and the proportion of affordable housing required should be increased. The requirement that “a lower percentage [than 80% of open market rents] should be set where this would preclude access to housing benefit.” is absolutely essential, and must in all circumstances be retained. Without such a proviso, the whole policy becomes meaningless and would inevitably fail in its aims.

Current Policy 69S is planned to be replaced by Policy E1S. In doing so the current explicit “focus for jobs growth … [on] the urban area of Bedford and Kempston” is removed, when this should be retained. As mentioned above, it also references policy 72S of Bedford Local Plan 2030, which should be amended.

Current Policy 71 - Other employment sites – is not proposed for amendment, but should be amended. Where existing employment sites are in locations suitable for travel-to-work by public transport, walking and cycling, the primary aim should be that they are retained for employment use, and if considered for redevelopment to non-employment uses criterion ii should be strengthened, for example by requiring advertising of the site’s availability for alternative employment uses.

As already mentioned, Current Policy 72S – Additional strategic employment development should be amended, even though no proposal for amendment has been made in the consultation. Sites should not be considered appropriate if the range of transport modes does not include **both** public transport at relevant hours for employees *and* practical access at relevant hours for those using active transport to/from substantial concentrations of housing.

Current Policy 76 – Improvement and provision of new visitor accommodation – is not proposed for amendment, but should be amended. In addition, visitor-related buildings should only be granted planning permission if both there is provision for workers to travel between the site and significant housing concentrations without use of private cars, and the plans include measures for at least one quarter of those using the site to arrive/depart without use of private cars when the site opens and for that minimum level to increase each year.
Current Policy 86S – Delivering infrastructure – is not proposed for amendment, but should be amended. Provision of infrastructure for road transport should not be considered an acceptable form of infrastructure for the provisions of this policy.

Current Policy 89 – Electric vehicle infrastructure – is not proposed for amendment, but should be amended to remove the mistaken impression it conveys that electric vehicles are “sustainable modes of transport”, while making provision for some shift from internal combustion to electric vehicles in existing urban areas. Thus, the final paragraph should be amended to read
“New residential developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations and, where appropriate, provide electric charging points at a rate of one per dwelling. Where developments are made in the urban area that increase the size of a residential property, an electric charging point should be provided. If there is no off-street parking on the premises, the developer should contribute to the provision of an electric charging point for public use in a nearby street”.

Current Policy 90S – Transport infrastructure and network improvements – is not proposed for amendment, but should be amended. Measures such as the “Dualling of the Bedford Western Bypass” and “Improvements on Highway England’s strategic road network” are not consistent with measures to combat climate breakdown and to meet the needs of the climate emergency. Reducing congestion should not, as mentioned above, be an aim in itself. Instead, modal shift towards public transport and active travel should be the aim, since such modal shift implies less energy consumption and less land taken for road transport.